

Corey Donaldson - Relator

Former Core Civic/BOP/ICE Detainee/Inmate #19537081


ImNowUnleashed@gmail.com

Phone calls by arrangement.

DISCLOSURE STATEMENT

SWORN AFFIDAVIT OF RELATOR COREY DONALDSON

Under 28 USC 1746 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 15th, 2019.

Signed 

Corey Donaldson

**EVIDENCE AGAINST CORE CIVIC (NYSE: CXW) AS TO FALSE CLAIMS
WHICH DEFRAUD & OFFEND MULTIPLE UNITED STATES AGENCIES**

MY SWORN TESTIMONY

SUMMARY

A - Private prison contractor Core Civic (<https://en.wikipedia.org/wiki/CoreCivic>) have a Bureau of Prisons contract requirement for healthcare accreditation with The Joint Commission. Each individual facility must be accredited as a condition of the annual multi-million-dollar contract, signed for in blocks of years at a time. Core Civic have knowingly misled the OIG/BOP/SEC/ICE/Shareholders with

promises of accreditation compliance in official government reports, and have represented on their website that they are so accredited. However, I have uncovered "original" evidence that ZERO Core Civic facilities are so accredited and THE JOINT COMMISSION have even forced Core Civic to withdraw fraudulent accreditation representations from their website, which they complied with, and did not respond with accreditation. This has created a discriminatory and significant risk to the health and safety of Immigrants, because this policy affects only those locations with Immigrants, which may provoke criminal civil rights violations.

There are 6 exhibits.

EMERGENCY: The evidence is that Core Civic is engaging healthcare fraud and the evidence is that Immigrants are dying in their facilities. The connection is inescapable, making this healthcare fraud an emergency life and death issue. For example: <https://theintercept.com/2019/08/29/ice-solitary-mental-health-corecivic/>

This healthcare fraud has also given freeway for "industrial level" sex crimes to be carried out on Immigrants involving the cover-up participation of healthcare workers at Core Civic, as is shown below.

B - I possess proof/inside documents of Core Civic "industrial scale" staff sex crimes only upon Immigrants at Core Civics' McRae Correctional Institution, with approval from head office in Nashville, retaliation for reporting staff sex crimes, financially incentivised twice-falsified PRISON RAPE ELIMINATION ACT of 2003 (PREA) reports to the Federal Government (p.20-24), mishandling of sex crime grievances, concealing evidence, mail fraud, and the conscious violation of contract compliance obligations related to PREA, in order to mislead the BOP/SEC/OIG/ICE and ensure unjust enrichment. Core Civic counts on Immigrants it executes sex crimes upon, with knowledge of '*how the sausage is made*', to be deported into silence and out of reach of the courts for redress. Only a deported Immigrant could testify to all these matters. I am one of those so deported and I was a target and witness to all these events. Staff witnesses are named. Inmate witnesses are available.

There are 26 exhibits.

MATERIALITY

The evidence will demonstrate "materiality" because it will show through BOP (Bureau of Prisons) and OIG (Office of Inspector General) statements that once the government knows the truth it will either stop paying for Core Civics' services or make them correct the fraud.

For example, obedience to all local, state and federal laws are a condition of the contract as commanded by the BOP. See: https://www.bop.gov/about/facilities/contract_facilities.jsp

As a result of this contract condition, any lawbreaking whatsoever, combined with a fraud to cover it up, manifests a contract violation requiring remedy.

This case will demonstrate a cargo of broken laws, satisfying the "materiality test" for an FCA case.

It is widely acknowledged by US lawmakers that The Bureau of Prison are notorious for insufficient oversight over private prison contract enforcement, relying on accreditation for quality care (Exhibit A - Exhibit Five p.2-3).

In an official OIG "Review of the Federal Bureau of Prisons' Monitoring of Contract Prisons" it was decided:

"We found that, in most key areas, contract prisons incurred more safety and security incidents per capita than comparable BOP institutions and that the BOP needs to improve how it monitors contract prisons in several areas." (Exhibit A- Exhibit One)

Only an FCA action can resolve the material frauds at issue in this case, as the BOP are inadequate in enforcement.

Core Civic Financials

1. <https://en.wikipedia.org/wiki/CoreCivic>

2. <https://corecivic.gcs-web.com/stock-information/fundamentals/income-statement>

Revenue	▲ \$ 1.736 billion
<u>Operating income</u>	▲ \$ 332.06 million
<u>Net income</u>	▲ \$ 162.51 million
<u>Total assets</u>	▲ \$ 3.020 billion
<u>Total equity</u>	▲ \$ 1.408 billion

"CoreCivic's BOP contracts— which covered five facilities collectively housing approximately 8,000 inmates—were responsible for between 11% and 13% of CoreCivic's annual revenue." (Exhibit A Exhibit 6 p.2)

This income is protected by the fraud of Core Civic.

THE FALSE CLAIMS ACT CASE

BACKGROUND A - THE JOINT COMMISSION FRAUD

The case of Core Civic fraud upon the Government in terms of accreditation with The Joint Commission, is outlined in Exhibit A.

BACKGROUND B - PREA & FALSIFIED DOCUMENTS FRAUD

Between the latter portion of 2017 through to February 20th, 2018 I, Corey Donaldson, was incarcerated at CORE CIVICS Low Security McRae Correctional Facility as an Immigrant Inmate, in an Immigration Facility, located at 112 Jim Hammock Drive, McRae, Georgia 31055 USA. On February 20th, 2108, I was released from McRae and Bureau of Prisons (BOP) custody.

Though I was held by the BOP, for the last six months of my sentence I was detained under the authority of Immigration and Customs Enforcement (ICE) with in immigration detainer pending deportation (Exhibit One). That ICE detainer held me from 8/20/2017 until 2/20/18, otherwise I would have been released on my Home Eligibility date of 8/20/2017 (Exhibit Two).

Since the events spoken of in this affidavit occurred in the final six months of my sentence, while being physically held by the BOP but detained by ICE on paper, both ICE and BOP contracts with Core Civic are in play for False Claim exposure.

FALSE CLAIM ONE:

To ensure continued funding, Core Civic calculates not to disclose noncompliance with:

- THE PRISON RAPE ELIMINATION ACT OF 2003
- BOP PROGRAM STATEMENTS
- THE BOP/ICE CONTRACT
- CORE CIVIC'S OWN POLICIES
- UNITED STATES CRIMINAL STATUTES RE: THE DOJ & IRS

These themes persist through this affidavit.

Previously on December 28th, 2017 I began an informal resolution proceeding (Exhibit Three) regarding organized criminal sexual harassment of Immigrant Inmates on a daily basis, which included myself. CORE CIVIC's McRae staff were physically peering upon immigrant inmates in the toilets and showers AND knowingly recording explicit video streams of

inmates taking showers and using the toilets 24/7, with no stated penological or legal interest.

CORE CIVIC (PRISON RAPE ELIMINATION ACT 2003) PREA SEXUAL HARASSMENT POLICY DEFINITION

From page 4 of <https://www.corecivic.com/hubfs/files/PREA/CCA-14-02.pdf>

Core Civic has mandated zero-tolerance towards all forms of sexual abuse and sexual harassment. Such conduct is prohibited by this policy and will not be tolerated...

Sexual Harassment – Includes any of the following acts...

Voyeurism – An invasion of privacy of an inmate/detainee by an employee, contractor, or civilian for reasons unrelated to official duties, such as peering at an inmate/detainee who is using a toilet in his or her cell to perform bodily functions; requiring an inmate/detainee to expose his or her buttocks, genitals, or breasts; or taking images of all or part of an inmate/detainee's naked body or of an inmate/detainee performing bodily functions.

At McRae C.I. the voyeurism zoom cameras above the toilets and showers were acutely positioned to maximize the capturing of intrusive footage of immigrant men performing explicit private bodily functions while taking showers and sitting or standing using the toilets. Images were recorded for a debased data library, and to induce abject humiliation, with no stated lawful or penological interest, thereby violating the federal voyeurism statutes of 18 USC 1801.

The peering and voyeurism had been occurring under the watch and sanction of Warden Stacey Stone, Assistant Warden &

PREA Coordinator Shawn Gillis, Assistant Warden Terrence Dickerson, Chief of Unit Management Jody Yancy and Chief of Security Christopher Chestnut.

The very person assigned to ensure compliance with PREA/SEXUAL HARRASSMENT matters is the very person who, as I will show, besieged me personally for reporting his personal violations in this matter - **PREA Compliance Manager: Assistant Warden Shawn Gillis.**

We could see the zoom cameras performing their dirty work through the windows into the security area outside the dorms, also confirmed by Mr. (Special Investigation Service Chief) Weeks.

The toilet and shower area were constructed to encourage staff to peer upon inmates, in violation of quoted PREA policy.

On January 9th 2018 my informal resolution was officially answered, omitting and concealing every issue/law/exhibit/witness I had raised (Exhibit Four), in violation of **The Bureau Of Prisons Program Statement - ADMINISTRATIVE REMEDY PROGRAM (1330.18)** where it is mandated that a response to an informal resolution 'should answer completely the request or appeal, be accurate and factual...' and address the 'closely related issues' raised by the inmate (1330.18(8c2)).

On January 11th, 2018 I began formal grievance procedures (Exhibit Five, begins with Core Civic signed log of grievances acknowledging the entire process of grievances).

As a result of my grievance, on January 17th, 2018 a prison-wide staff meeting was held where PREA warnings were issued to staff relating to peering, and notice was given that the voyeurism cameras were to be removed the following day.

On January 17th, 2018 I sent a certified letter to the FBI (Exhibit Six) asking how to report crimes within the prison (Exhibit Seven).

The fate of that letter remains unknown due to tampering by AW Terrence Dickerson who later assured me that letter would never make it to the FBI, provoking the oversight of US Law at *18 U.S. Code § 1708 Theft or receipt of stolen mail matter generally ... & 18 U.S. Code § 1703 Delay or destruction of mail or newspapers ...*

A day after my attempt to notify the FBI of the sex crimes within the prison, and on January 18th, 2018, all VOYEURISM CAMERAS and wiring through the entire prison were **GUTTED & REMOVED** by a contractor from COMNET, supervised over by Core Civic Corrections Officers. This event was striking, in the face of the prior Core Civic denial of my grievance relating to the voyeurism cameras (Exhibit Four).

Core Civic recycled a policy statement about general security cameras (Exhibit Four), a matter with which I have no debate. But Core Civic were careful to omit mention of the specific voyeurism cameras in question, and careful to omit mention their removal subsequent to my grievance.

If the voyeurism cameras were innocent and within policy and law, why remove them all throughout the entire prison after my grievance about them?

I was one of the witnesses to the carnage upon the voyeurism cameras (Exhibit Eight).

You tell me that I had not provided 'credible evidence of harassment or voyeurism' and then you extract, destroy, OBSTRUCT, TAMPER and RETALIATE against the very evidence I had referenced.

But, if I did not have 'credible evidence' to support my claims of Core Civic sponsored VOYEURISM, why pull the cameras, why pull the 'credible evidence'?

All Immigrants in open bay dorms on this date are witnesses/victims. That amounts to about 700-900 men, not to mention the 1000's who had come and gone beforehand. All such Immigrants were explicitly violated on a daily basis, each time they used the toilet or shower.

Since Core Civic promises The United States that they maintain a 'ZERO TOLERANCE' policy for sex crimes, each time an individual inmate used the toilet or shower under this regime, a new and different false claim occurrence is

manifest. Multiply that by 1000's of inmates over years and the quantity of daily usage per inmate, and the scale of this outrage mushrooms. See...

<https://www.corecivic.com/hubfs/files/PREA/CCA-14-02.pdf>

On January 19th, 2018 Assistant Warden Terrance Dickerson officially answered my January 11th grievance (Exhibit Five) omitting and concealing every issue/law/exhibit/witness I had raised (Exhibit Nine).

This posture of omitting and concealing the contents of my grievances was a strategy by Core Civic staff to evade the potency of their crimes, and continues to this day, and remains a persistent violation of **The Bureau Of Prisons Program Statement - ADMINISTRATIVE REMEDY PROGRAM (1330.18)** where it is mandated that a response to an informal resolution 'should answer completely the request or appeal, be accurate and factual...' and address the 'closely related issues' raised by the inmate (1330.18(8c2)).

On January 22nd, 2018 I persisted in my official grievance, drawing sharp attention to the removal of the VOYEURISM CAMERAS in the Core Civic attempt to cover up what had been ongoing for years. I informed them of all the witness of their wrongdoing (Exhibit Eight) and requested permission to gather witnesses together to testify.

FALSE CLAIM TWO:

CORE CIVIC PROMISES THE UNITED STATES THAT IT DOES NOT RETALIATE AGAINST PREA GRIEVANCES, WHEN IT IS PRECISE IN ITS ORGANISATION TO DO SO.

Since the grievances I had filed in-effect address false claims Core Civic had made to The United States relative to its PREA policies and practices, retaliation for so reporting a false claim now comes into play.

On 1/24/2108, a few days after I filed the January 22nd grievance, while seated at a table in my dorm, I was swarmed upon by a platoon of Corrections Officers and Senior Staff, concentrating TWO recording video cameras on my person. I was pressed against the wall, cuffed and ordered to be stripped nude and installed into the HOLE involuntarily by Captain Reynolds (Exhibit Ten). The Captain later told me she was acting on orders of AW Terrence Dickerson, who was one of those I had filed the PREA complaint against.

No charge of any infringement was ever brought against me.

Officially, I was told I needed protection from those I filed the sexual harassment grievance against because I made a statement demonstrating concern for my safety from those I was reporting against (Exhibit Eight):

NOTE: PRECAUTIONS HAVE BEEN TAKEN IN THE CASE THAT YOU DECIDE THAT THE EASIEST WAY TO DEAL WITH ME IS AN AMERICAN STYLE EXECUTION, POSING AS A SUICIDE.

Those I reported against, are those who said I needed to be placed in the HOLE, to be protected from those I filed against. I know, it sounds nonsensical. But there is proof (Exhibit Eleven) of this charade, orchestrated by Warden Stacey Stone, Assistant Warden & PREA Coordinator Shawn Gillis, Assistant Warden Terrence Dickerson, Chief of Unit Management Jody Yancy and Chief of Security Christopher Chestnut.

The propaganda I was being fed was a decoy to distract from the reality of the active retaliation. I was physically tampered with as a witness/target, for drawing attention to the ongoing organised sexual harassment within the prison, highlighting Core Civic false claims, and then alienated from contact with other witnesses.

Being thrown in the HOLE in retaliation for reporting PREA violations and sex crimes was an act of volcanic physical revenge against my person, and at odds with:

- 18 U.S. Code §1512 Tampering with a witness, victim, or an informant
- 18 U.S. Code §1513 Retaliating against a witness, victim, or an informant
- PREA investigation policies promised by Core Civic:

<https://www.corecivic.com/hubfs/files/PREA/CCA-14-02.pdf?t=1539962057757>

On January 31st I began a HUNGER STRIKE to protest the retaliation against me for reporting organised criminal sexual harassment. I made posters that I pinned pointing outward from my cell door in the HOLE (Exhibit Twelve).

Core Civic medical records confess that Warden Stacy Stone spoke to me in the HOLE (*though he was forbidden to do so based on PREA protocols, since I named him as a perpetrator*).

Medical records report that I was handcuffed behind my back when taken to medical, that my responses to medical staff were "*appropriate, his thoughts were well organised*", "*...not a danger to self or others. His hunger strike is purposeful and in protest of placement in the SHU. It is not the result of serious mental illness*". I was on the HOLE based on "*PREA concerns*", and in reference to me the records say, "*his wit is sharp*". My strike continued to the next facility after the 2/20/2108 release from Core Civic at McRae. (Medical Records - Exhibit Thirteen).

Many times, I had requested proof that policy dictates that all inmates in the HOLE be governed by handcuffs when taken to medical. No such proof could ever be provided, because it was purely a punitive exercise (Exhibit Fourteen).

I was directed by AW Terrence Dickerson to ask for the policy from Ms. Harris, the Librarian, which I did. She told me the policy did not exist.

On February 2nd 2018, the man I accused of PREA violations, Warden Stacy Stone replied to my grievance and recycled previous positions, omitting and concealing every issue/law/exhibit/witness I had raised, including the official removal of the VOYEURISM CAMERAS (Exhibit Fifteen) and my hunger strike for being thrown in the HOLE, which was by now, the evasive default position, to ignore my evidence with purpose.

It was a wholesale coverup of CRIMES committed, a suffocation, by one of the very men I had accused, Warden Stacey Stone.

As one of the men I had accused, PREA protocols demand that he is to have no contact with me or be involved in the resolution of my grievance. Never has a conflict of interest been so brazen, nor a violation of Core Civics' own promised PREA protocols to The United States been so defiantly executed:

<https://www.corecivic.com/hubfs/files/PREA/CCA-14-02.pdf?t=1539962057757>

From the beginning of the 20 DAY HUNGER STRIKE on January 31st 2018 to my departure on February 20th 2018, I was

constantly harassed, intimidated, threatened and besieged by the very staff I filed my grievances against, as they tried to get me to come out of my cell in chains and into a private room where they could have their way with me. I refused entirely, which medical records affirm, into their visible wrath.

It was not lost on me that Warden Stone and Co. insisted I be placed in the HOLE to be protected from those I accused, which was himself and his staff, then they feigned bewilderment as to why I refused to be extracted from the HOLE in handcuffs whereupon they could take me into a windowless room.

Again, PREA investigation protocols demand that those against whom charges are laid are forbidden from contacting the target. The named Senior Staff were undeterred by PREA policies, they pressed me nonetheless (Jody Yancy was the only one who did not approach me while I was in the HOLE, but he did nothing to stop the others from doing it, as he watched).

While in the HOLE I spoke to Safety Officer Mr Hill Jnr while conducting his daily rounds, about the voyeurism cameras and what led to my being installed in the HOLE. His frustration was immediate. He confessed he had been trying for years to get those cameras torn down, but no one would listen to him. *"I've been telling them about those cameras for years, but they won't listen"* lamented Mr. Hill Jnr. Later, as I

relayed to Warden Stone what Mr Hill Jnr told me, he reflexed a teeth-grinding angst. I never saw Mr Hill Jnr again, not on his daily rounds or otherwise.

Mr. Hill Jnr's last known work phone number and work address was 229-868-7778 / 112 Jim Hammock Drive, McRae, GA 31055.

By February 5th, 2018 my attempts to get other senior staff at McRae C.I. to help me have my sexual harassment grievance and retaliation atoned for, fell on deaf ears. They were SIS Mr. Weeks, Clinical Supervisor Ruggenberg, & Dr. Heyer (Exhibit Sixteen), each of whom rejected an invitation to contribute to a letter I was sending to a Judge.

On February 5th, 2018 I completed the final stage in allowable grievances by writing to the VICE PRESIDENT of CORE CIVIC in Nashville Tennessee (Exhibit Seventeen).

On February 6th, 2018 I sent a certified letter to the CHIEF JUDGE of The US DISTRICT COURT for the Southern District of Georgia, in compliance with 18 USC 3 (Misprision of Felony). I informed him of the crimes occurring at McRae (Exhibit Sixteen). The fate of that US mail remains unknown, but was tampered with by McRae staff, as I will demonstrate.

On February 20th, 2018 I was released from McRae C.I. (Exhibit Eighteen), and was redirected into ICE custody, awaiting deportation.

On February 26th, 2018 the answer from the VICE PRESIDENT of CORE CIVIC William Dalius (Exhibit Nineteen) was written and signed for by him in the logbook (Exhibit Five, 2nd page Log) .

VICE PRESIDENT'S DECISION (Attach additional pages if necessary. All pages must include the grievance number.)	
See attachment	
Vice President's Signature: <u>[Signature]</u>	Date: <u>2-26-18</u>
Inmate's Signature (upon receipt) _____	Date: _____

William Dalius omitted and concealed every issue/law/exhibit/witness I had offered in all prior PREA grievances, including knowledge of bribing PREA officials (Exhibit Five) to pass audits, and the official removal of the VOYEURISM CAMERAS, in violation of **The Bureau Of Prisons Program Statement - ADMINISTRATIVE REMEDY PROGRAM (1330.18)** where it is mandated that a response to an informal resolution 'should answer completely the request or appeal, be accurate and factual...' and address the 'closely related issues' raised by the inmate (1330.18(8c2)).

The Vice President of Core Civic William Dalius stated in his final answer to my grievances (Exhibit Nineteen) that I had '*provided no specific or credible evidence to support*' my grievances, and he committed various crimes by saying so.

The '*specific and credible evidence*' found in the removing of voyeurism cameras, the staff meeting relating to

peering, the availability of witnesses, the retaliation against me, the destruction of video evidence, was all evaded by William Dalius. Such evidence was before him from grievances I had submitted. He read the grievances, then replied with evasion and falsification in order to cover-up the Core Civic organised sexual harassment program upon Immigrants, and thereby betrayed the contract with the United States, and offended criminal laws of The United States.

FALSE CLAIM THREE:

**CORE CIVIC FALISFIED REPORTS TO THE UNITED STATES
ASSERTING NO "EMPLOYEE ON INMATE SEXUAL HARASSMENT"
COMPLAINTS WERE MADE.**

Now to contrast original non-public documents with the Core Civic public reports to the government.

After Dalius lied about existence of the evidence, and under his knowledge, Core Civic falsified official reporting documents to The United States, declaring ZERO reports were made in the calendar year of 2017 of "employee on inmate sexual harassment" at McRae C.I in Georgia, when evidence herein shows such reports were made - TWICE!. See specifically page nine:

<http://www.corecivic.com/hubfs/files/PREA/2017-PREA%20AnnualReport-FINAL5.pdf>

Core Civic knew about the sexual harassment reports (evidence of the second complaint is forthcoming p.28), and ensured they were NOT reported to The United States, because the BOP have stated that staff sexual harassment violates the BOP contract (p.39), and is further violation because it is a crime. https://www.bop.gov/about/facilities/contract_facilities.jsp

This falsification of official reporting documents occurred even in the face of Core Civic staff acknowledged receipts that my sexual harassment grievance was made in 2017 (Exhibit Three).

14-5A

INFORMAL RESOLUTION

To be completed by inmate/resident:		
Date: <u>12-16-17 / 12-27-17 / 12-28-17</u>		
Name (Print): <u>Ronaldson</u>	<u>Lois</u>	<u>A</u>
<small>Last Name</small>	<small>First Name</small>	<small>Middle Initial</small>
Number: <u>19537081</u> HOUSING ASSIGNMENT: <u>HE 116L</u>		
Description of issue, problem, and solution you suggest:		
<u>Harassment issue as detailed in the</u>		
<u>attached documents</u>		

Attach additional pages, if necessary.

FOR STAFF USE ONLY:
Date received from inmate/resident: <u>12/28/17</u>
Name of staff member completing informal resolution process: <u>[Signature]</u>

(Exhibit Four)

This memorandum is in response to your Informal Resolution form, received December 28, 2017, and the following requests:

The daylight fabrication of official documents by omission and concealment allows the noose to tighten upon VP William Dalius and others at Core Civic, as it relates to *18 U.S. Code §1519 Destruction, alteration, or falsification of records in Federal investigations and bankruptcy & 18 U.S. Code §1520 Destruction of corporate audit records.*

Since my PREA grievances exposed "industrial scale" sex offences upon Immigrants as a part of the Core Civic fabric, Core Civic calculated NOT to file a record of my sexual harassment grievance with The United States, care of the Bureau of Prisons, though they were mandated to do so by the Prison Rape Elimination Act 2003.

VP William Dalius knowingly lied when he stated that BOP Program Statement 1350.01 was followed in this case. No referral was made to outside authorities of crimes committed. No official reporting of any kind was done anywhere. It was a wholesale cover-up of criminal proportions.

Such a posture of covering-up by the Vice president of Core Civic provokes the attention of *18 USC 1001 & 1519 where any attempt to 'falsify, conceal, or cover up by any trick, scheme, or device a material fact'* on a Federal Document will

invoke criminal indictments. *18 U.S. Code §3. Accessory after the fact* is also in play.

Because the Vice President knew an *18 USC 1801 Voyeurism* felony had occurred in violating Core Civics' own voyeurism policy, and did not report it, and lied about the existence of the report, he is culpable under *18 U.S. Code §4. Misprision of felony* statutes, and *18 U.S. Code §3. Accessory after the fact* statutes, and *18 USC 371 Conspiracy* statutes.

The Bureau of Prison Program Statement on Criminal Matter Referrals (1350.01) citing investigation protocols and reporting crime to authorities, was blatantly sidelined by all those named herein.

In fact, all Core Civic staff named herein are responsible for the acts of peering, voyeurism, failure to report to authorities and the subsequent cover-up, namely Warden Stacey Stone, Assistant Warden & PREA Coordinator Shawn Gillis, Assistant Warden Terrence Dickerson, Chief of Unit Management Jody Yancy and Chief of Security Christopher Chestnut. The named medical staff herein and on the medical records also wear culpability.

Later, Warden Stacey Stone was removed from McRae C.I., Assistant Warden and PREA Coordinator Shawn Gillis was also removed from McRae, but then promoted to Warden of Adams County Correctional Center in Mississippi.

Though the VICE PRESIDENT in Nashville answered my grievance on February 26th, 2018 with his own cover-up (Exhibit Five where Dalius signed the log), I did not receive the completed grievance until July 27th, 2018 in Australia by US Mail (Exhibit Twenty).

VICE PRESIDENT'S DECISION (Attach additional pages if necessary. All pages must include the grievance number.)	
See Attachment	
Vice President's Signature: <u>W. Dalius</u>	Date: <u>2-26-18</u>
Inmate's Signature (upon receipt)	Date:

The instrument cultivated by the Vice President William Dalius of CORE CIVIC to inform me of the various falsifications, lies and cover-up relating to sexual harassment crimes against my person, in furtherance of a business enterprise, was the United States Mail (Exhibit Twenty), thereby meeting the requirements for Mail Fraud prosecution under 18 U.S. Code §1341 Frauds and Swindles & more broadly, 18 U.S. Code CHAPTER 96- RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS (Exhibit Three).

The contracts the B.O.P. has with Core Civic places a 'PAYDIRT' monetary value on me and other inmates as property or merchandise, worth multiple millions of dollars per year to Core Civic and its salary siphoning employees.

I am monetized physical product to Core Civic and its staff.

Because the pattern of violations of 18 USC 1801 are occurring as a part of an 'enterprise' in which Core Civic is profiting, such behavior violates the 'racketeering activity' provisions of 18 USC 1957(a) and (f) (1) and 18 USC 1962 (b) and 18 USC 1961.

Because the 'pattern of racketeering activity' provisions of 18 USC 1961 (1)(4)(5) are at issue, and Core Civic, and all staff at MCF execute their role in violating 18 USC 1801 to 'maintain...position in an enterprise', all engage in a 'pattern of racketeering activity' lest they be fired for insubordination, triggering the crimes in aid of 'racketeering activity' provisions at 18 USC 1959 (a).

On April 2nd, 2018 a Federal Chief Judge received the certified letter I had sent nearly TWO MONTHS earlier on February 6th, 2018 from McRae (Exhibit Sixteen). That letter should have taken three days at most to arrive, but it took two months! Between the time I was given a receipt by prison staff of the certified mail I was sending, and the time the mail was actually sent(Exhibit Twenty-One), a mail crime was committed with that delay, offending The United States at 18 U.S. Code § 1703 Delay or destruction of mail or newspapers ...

The Staff at McRae deliberately delayed/tampered with the letter to the Judge until well after I had been released from their custody. Based on this fact, it is not unreasonable to believe the contents may also have been tampered with. What I know for sure is that no response from the Judge has been

received in reply to organised sex crimes. On the balance of probabilities, given Core Civics' reputation for suppressing the record and mail tampering in this case, I do not believe the Judge received what I sent him, and there is no evidence to contradict this position.

Conscious delay of mail and using the mail to cover-up/propagate crime is MAIL FRAUD, provoking the oversight of US Law at 18 U.S. Code § 1708 Theft or receipt of stolen mail matter generally ...

Moreover, all Core Civic staff are also postal workers, given their control and distribution of US Mail and stamps within prisons, and can be held to account as postal workers for crimes committed (Exhibit Three).

Core Civic and every employee at McCrae Correctional Facility are Federal Officers by virtue of the postal services (mail delivery, acceptance of mail, collection, sorting, transportation 39 U.S.C. 102(5) and handling, transportation, forwarding, returning and holding of mail 39 U.S.C. 404(1) and providing and selling postage stamps 39 U.S.C. 404(4)) they provide to inmates as defined by language in 39 U.S.C. 102, 404, 409, 1008, 1011, and 2805, which are 'inherently government functions' according to Congress as stipulated in 39 U.S.C.2805.

Core Civic and the executives at this prison (Warden Stacey Stone, AW Shawn Gillis, AW Terrence Dickerson, Chief of Unit Management Jody Yancy, Chief of Security Christopher Chestnut) each possess the responsibility to oversee and be responsible for the postal functions provided at M.C.F as defined above.

As stated in 39 U.S.C. 1008(a), 'a person temporarily employed to deliver mail is deemed an employee of the Postal Service and is subject to'18 USC 1701, 1702, 1703, 1705, and 1709 'to the same extent as other employees of the Postal Service.' Even if such a 'person' is only 'under contract', that person is still considered accountable (39 U.S.C. 1008(b)) as performing an 'inherently government function' (39 U.S.C.2805).

All actions undertaken by staff at MCF are executed as POSTAL WORKERS.

In Bivens v SIX UNKNOWN NAMED AGENTS OF THE FEDERAL BUREAU OF NARCOTICS 403 U.S. 388, 29 L.Ed.2d 619, the Apex court declared that..."power, once granted, does not disappear like a magic gift when it is wrongfully used" 403 US 392.

Core Civic and its workers cannot divide what they do, some being Federal postal functions, others not. If you are a Federal Postal Worker, all you do comes under that umbrella.

I.C.E and the B.O.P can do whatever they want without concern of a Federal lawsuit because of the sovereign immunity they bask in. However, any Core Civic or Core Civic POSTAL WORKER action that violates U.S. Codes at the behest of a government agency is subject to criminal indictments as an ACCESSORY (18 USC 3), and a BIVENS suit by acting at the direction and on behalf of a government entity and by being POSTAL WORKERS.

FALSE CLAIM FOUR:

**A SECOND PREA CLAIM IN 2017 IS NOT REPORTED TO THE
UNITED STATES, IS SABOTAGED AND RETALIATED AGAINST,
DEMONSTRATING A PATTERN:**

Earlier (Exhibit Five, 3rd page*) the sabotage and retaliation of an additional PREA violation was raised in my protest at "how things are done here" at Core Civic McRae.

It is there noted that I was held in handcuffs by Chief of Unit Management Jody Yancy after reporting a PREA violation against Unit Manager Tim Wheaton. Jody was forcing me to withdraw my complaint under threat of punishment and worsened conditions, while restrained.

Tim thought it was okay to come and yell at me in front of other inmates to induce humiliation while I was in a relative state of undress inside an open toilet stall, I yelled back at him, and reported his actions as a sexual harassment issue under PREA for peering at and humiliating me while I was at the toilet.

Later, while he had me cuffed behind my back, Jody Yancy insisted that I was wrong, that it was not a PREA violation, and unless I signed a confession admitting such that I would spend the balance of my sentence in the HOLE. I therefore

wrote and signed a confession (Exhibit Twenty-Two) though it took some time to get a copy of it (Exhibit Twenty-Three). Later, I filed a grievance to exhaustion on the entire charade (Exhibit Twenty-Four), again signed for by VP William Dalius in the log (Exhibit Twenty-Four 2nd page) with his written reply on a separate page altogether (final page in Exhibit Twenty-Four).

The outstanding feature of this episode is that for the second time, Core Civic represented to The United States that no "employee on inmate sexual harassment" grievance occurred in 2017 in the provided categories of SUBSTANTIATED - UNSUBSTANTIATED - UNFOUNDED - PENDING.

Note that even if the claim is "officially" UNFOUNDED, reporting guidelines are still required. See specifically page nine:

<http://www.corecivic.com/hubfs/files/PREA/2017-PREA%20AnnualReport-FINAL5.pdf>

Core Civic knew about the sexual harassment complaint, and ensured it was NOT reported to The United States, because sexual harassment violates the BOP contract (p.39), which would cause the funding to cease.

Again, VP Dalius utilised the US Mail (Exhibit Twenty) to deliver the answered suppression of all sex crime evidence presented and deliver his cover-up (Mail Fraud 18 U.S. Code

§1341 Frauds and Swindles), then decided to NOT report the PREA incident to The United States, in violation of the contract and Statutes.

Core Civic knew about the sexual harassment complaint, and ensured it was NOT reported to The United States, in order to appear compliant with nonnegotiable PREA aspects of the contract, and engineered to defraud and offend the United States, as is their established pattern, in collusion with VP William Dalius.

FALSE CLAIM FIVE:

***CORE CIVIC ACTIVELY SABOTAGES EFFORTS FOR REDRESS
RELATING TO PREA COMPLAINTS, IN CONTRAST TO ITS
PROMISED POLICIES TO THE UNITED STATES.***

At no time were promised Core Civic INVESTIGATION PROTOCOLS followed regarding my sexual harassment grievance, but the precise opposite was the practice. See:

<http://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea>

The following Corporate Management at Core Civic with specific responsibilities in areas discussed in this Affidavit

have refused to communicate with me in any way whatsoever, in order to remedy the cited abuses and ethics violations:

1. Eric Pierson - PREA Boss at Core Civic in charge of stated investigation protocols:

<http://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea>

When I contacted Karin H. Tyson, MPA Assistant Director of The Sexual Assault Support Center Inc. in Georgia, and told her my story, she later reported that Eric Pierson at Core Civic refused to respond to her.

Sexual Assault Support Center Inc.

909 Talbotton Road,

Suite A Columbus, GA 31904

P: 706.221.1033

E: TheCenterAt909@gmail.com

www.sexualassaultsupportcenter.com

2. Scott Craddock Corporate Ethics and Compliance Officer

[https://www.corecivic.com/hubfs/files/Code%20of%20Conduct%20\(CoreCivic\).pdf](https://www.corecivic.com/hubfs/files/Code%20of%20Conduct%20(CoreCivic).pdf)

3. Damon Hininger CEO of Core Civic (and all those listed in the link below

<http://www.corecivic.com/about/executive-leadership>

4. Cameron Hopewell Managing Director, Investor Relations

<http://ir.corecivic.com/contact-ir>

5. Amanda Gilchrist, Public Affairs Director

<http://www.corecivic.com/newsroom>

The organised silence and suppression to cover up these Core Civic crimes are highly coordinated and provoke 18 USC 371 Conspiracy statutes (Exhibit Three).

This UNLAWFUL CORRECTIONAL ACTIVITY has occurred for so many years at this facility (MCF) to so many thousands of inmates that it is an institutionalized PATTERN of criminal activity, sanctioned by Core Civic and every single staff member that works here; hence the inclusion of the 18 USC 371 CONSPIRACY.

It never mattered what evidence or witnesses I provided. My grievance of sexual harassment against Core Civic leadership was arranged by the combined legions of hell to be thwarted and rendered stillborn upon arrival. It was doomed & cursed by design; it never had a chance for redress.

Core Civic knew I had exposed their sex crimes and have committed still more crimes in their efforts to cover it up.

Since Core Civic thwarted my 18 USC 4 Misprision of Felony responsibility and right to report crimes at every turn, their actions may qualify oversight from 18 U.S. Code §241 Conspiracy against rights & 18 U.S. Code §242 Deprivation of rights under color of law & 18 U.S. Code §1510 Obstruction of criminal investigations & 18 U.S. Code §1505 Obstruction of proceedings before departments, agencies, and

committees, as the grievance proceeding herein are overseen by the Bureau of Prisons.

As retaliation against my person for reporting crime is at issue, further statutes may have a jealous interest in this case, such as: *18 U.S. Code §1512 Tampering with a witness, victim, or an informant & 18 U.S. Code §1513 Retaliating against a witness, victim, or an informant.*

Despite the following Core Civic cited public policies and promises to The United States representing that matters herein raised are to be ethically and legally resolved with transparency, by statutory mandate, Core Civic orphans quoted ethics and mandates, nonetheless, manifesting a suite of false claims upon The United States with arrogant abandon:

<http://www.corecivic.com/about/corporate-ethics>

[https://www.corecivic.com/hubfs/files/Code%20of%20Conduct%20\(CoreCivic\).pdf](https://www.corecivic.com/hubfs/files/Code%20of%20Conduct%20(CoreCivic).pdf)

<https://www.corecivic.com/hubfs/files/CoreCivic%20Human%20Rights%20policy%20statement.pdf>

<http://ir.corecivic.com/>

<http://www.corecivic.com/hubfs/files/2018-ESGReport.pdf>

<http://www.corecivic.com/about/social-responsibility>

None of these Core Civic publicly promised PROTOCOLS FOR PREA VIOLATIONS were followed in the present case:

<https://www.corecivic.com/hubfs/files/PREA/CCA-14-02.pdf?t=1539962057757>

Core Civic even has an online portal to report ethical clashes discovered within their facilities at www.corecivic.ethicspoint.com. To date, it has been dismissive in replying to my evidence regarding staff sex crimes, representing a further false claim in what it proports to do in relation to its contract with The United States.

I filed the Ethics-Point report on:

REPORT DETAILS

Report Submission Date

5/17/2019

Here's the reply I received:

Follow-Up Questions/Comments

5/29/2019 1:13 AM posted by Organization

Mr. Donaldson,

Thank you for your information and report. Ethics & Compliance has reviewed, and will take such action, if any, deemed appropriate based on such review.

Bryan Deemer

Director, Ethics & Compliance

CoreCivic Facility Support Center

10 Burton Hills Blvd, Nashville, TN, 37215

Email: bryan.deemer@corecivic.com

5/29/2019 7:14 AM posted by Reporter

I have more evidence to provide, do you want it?

I have a right to know what will be done about organized sex crimes executed upon my person. Please tell me?

Here's the conclusion of my efforts:

ISSUE TYPE:
VIOLATION OF POLICY, LAW OR REGULATION

[Report Details](#)

[Print My Report](#)

[Log Off](#)

QUESTIONS AND COMMENTS

The organization has closed this report.

Again, there is no addressing of the sex crimes or redress offered, which is consistent with my experience with Core Civic.

Core Civic says, "Transparency is a critical part of the relationships we have with our government partners and the taxpayers we ultimately serve, as well as our shareholders..."

<https://corecivic.gcs-web.com/static-files/e621a712-a923-43b7-8533-0fef1c04cab0>

Core Civic openly lies to its government partners and shareholders promising transparency. This affidavit provides evidence to contradict transparency.

Another example, IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION, see case # Case No. 3:16-cv-2267, relating to another case of Core Civic fraud, now scheduled for jury trial.

<https://www.courtlistener.com/docket/4530353/grae-v-corrections-corporation-of-america/?page=2>

From doc.76 page 17 (Exhibit A Exhibit 6 p,17):

"Similarly, in a 2012 proxy statement defending its decision to oppose the adoption of more stringent policies about reporting to investors regarding its handling of sexual abuse allegations, CoreCivic stated that it had "proactively adopted—and in some cases exceeded—many of the national PREA (Prison Rape Elimination Act) standards and best practices." (Id. ¶ 145.) "

This affidavit stands in stark contrast to this Core Civic lie about its PREA standards.

The above case also sites Core Civic virtual anarchy at Adams County Detention Centre and McRae Correctional Facility (Exhibit A Exhibit 6 p. 3-8 & 12-13).

This entire case (3:16-cv-2267) contains further evidence of Core Civic fraud upon the government, to support the original assertions made in this affidavit. The evidence in that case compared to this new case, though different, is a voice of harmony in its conclusions.

After my grievance of sexual harassment was placed in 2017 and the subsequent companywide cover-up; Damon Hininger, the CEO of Core Civic, did on February 11th, 2019 also receive an email from me detailing the evidence. Damon then sold \$439,683.19 in Core Civic stock, possibly based on non-public information regarding the evidence in this Affidavit, which had matured within Core Civic circles since my 2017 grievance:

<https://www.sec.gov/Archives/edgar/data/1070985/000120919119014990/xslF345X03/doc4.xml>

Damon Hininger has since blocked my ability to question him on unresolved Core Civic sexual harassment issues on twitter, as has Core Civic proper:

You're blocked

You can't follow or see @DamonHininger's Tweets. [Learn more](#)

You're blocked

You can't follow or see @CoreCivic's Tweets. [Learn more](#)

Damon rejects my emails, with the hypocrisy of his own cited ethics pronouncements, claiming that under his leadership Core Civic are... *"governing ourselves at high standards of ethics and transparency...real-time public transparency keeps us accountable – to ourselves, our partners and our stakeholders – and improves our ability to better the public good."* See:

<http://www.corecivic.com/news/corecivics-first-ever-esg-report-shows-more-progress-toward-unprecedented-reentry-goals>

[https://www.corecivic.com/hubfs/files/Code%20of%20Conduct%20\(CoreCivic\).pdf](https://www.corecivic.com/hubfs/files/Code%20of%20Conduct%20(CoreCivic).pdf)

Any claim of Core Civics' high ethics and transparency is consciously misleading, and a knowingly false claim.

Outside of criminal law penalties, I note here that organised and wilful PREA violations do not come with a statutory penalty, but a false claim is manifest when Core Civic promises the United States that it does not violate statutory PREA standards, when in fact it is organised to do so, making The United States a laughing-stock within Core Civic.

Such wilful PREA offences offend several United States agencies, including SEC rules against misleading shareholders about what it is they do and don't do, IRS & DOJ laws against organised crime, and the ICE and BOP contract, as here stated:

17:32

97%



BOP-IPP/Public Affa... 17:20

to me



Hello, see our responses to your questions,

Office of Public Affairs
Information, Policy and Public Affairs Division
Federal Bureau of Prisons
(202) 514-6551 - phone
(202) 514-6620 - fax
>>> David Breakspear
<breakspeard69@gmail.com> 3/28/2019 2:49 PM
>>>

Dear Sir/Madam

I am writing a story on the relationship between CORECIVIC (CXW) and the BOP and have a few questions I need your assistance with please.

I am working on a deadline and would appreciate a reply within seven days please.

1 - Would the BOP consider CORECIVIC in violation of its contract if it was shown that CORECIVIC operates an organized sexual harassment program against immigrant inmates, and retaliates against these immigrants when complaints are made?

We cannot speak to any specific or alleged complaints regarding a specific contractor. But we note that sexual harassment against any inmate would violate the terms and conditions of a BOP contract. The contractor is expected to comply with the Prison Rape Elimination Act (PREA) and the BOP's Standards of Conduct. The contractor is required to develop policy and procedures for the establishment of a sexual abuse/assault program and comply with the requirements of PREA and BOP to prevent, detect and respond to sexual abuse or harassment as described in 28 CFR Part 115, "Prison Rape Elimination Act National Standards", including zero tolerance towards all forms of sexual abuse and sexual harassment.

2 - If these sexual harassment activities by CORECIVIC represented the opposite of what they broadcast in policy statements about what they do, would it be determined that CORECIVIC was in violation of the contract?

Again, without speaking with regard to any specific contractor, any violation of the terms and conditions of the contract is deemed as contract non-conformance.

3 - If CORECIVIC is knowingly violating PREA standards on an organized level, would this violate the contract it has with the BOP?

See response to #2 above.

4 - What does the BOP need in order to void a contract with CORECIVIC?

If the BOP were to determine that a contractor is in default of a contract, the BOP would follow the process described in the Federal Acquisition Regulations, Part 49 - Termination of Contracts.

39

Thank you in advance for your cooperation on this matter

ICE have their own mandates against voyeurism and retaliation for reporting sex crimes (Exhibit Twenty-Five).

Knowing their PREA violations violate the BOP contract, in addition to contract breaches with other United States agencies, Core Civic has an enormous financial interest in submitting false PREA reports to The United States. Criminal exposure left by these violations provoke a further potent Core Civic interest in suppression.

Since the breaches identified herein are not localised to one facility, but are approved of by head office in Nashville via the Vice President William Dalius:

- The United States has a jealous interest in auditing all PREA reports from Core Civic facilities to measure the brazen scope of contract violations.
- The SEC has justification to fine Core Civic for misleading shareholders about their sexual harassment practices. Had shareholders known about Core Civic actual practices, would they invest?!
- The IRS & DOJ are justified in filing indictments for organised crime, and levying appropriate fines.

So far reaching are the false claims of Core Civic, that multiple agencies of the United States have reason to seek urgent financial redress.

When contrasting CORE CIVIC policy to what I have witnessed, I testify that Core Civic policies are a decoy, conjured as a trick with intent to defraud The United States.

There is a hellbent calculation by CORE CIVIC to knowingly execute FELONIES, FALSE CLAIMS & MISLEAD:

- The United States
- The Bureau of Prisons
- Immigration and Customs Enforcement
- The Securities and Exchange Commission
- The IRS (RE: Organised Crime)
- The DOJ
- The American Taxpayer

As a result of reporting Core Civic sex crimes to Core Civic, the retaliation was swift with false imprisonment in the HOLE, mail tampering, record falsification, harassment, forced handcuffs with each visit to medical while on a hunger strike, and being ignored by every Core Civic official I have approached with evidence of wrongdoing since being released from Core Civic.

From the top down, there is a mandate within Core Civic to misrepresent their healthcare provisions, to sexually harass Immigrants, to respond to Immigrant grievances of staff sexual harassment with the brute force of a thug gang, organised crime and disciplined sociopathy, to penalise the

absence of stoicism, and to report falsely to the government about facts that betray their policies.

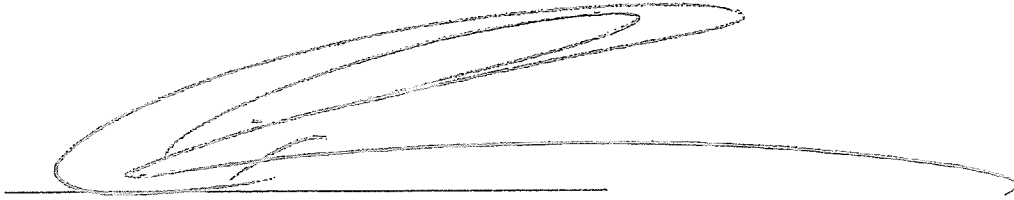
All this is the exact opposite to what Core Civic tell the government about what it is they do, as it makes a mockery of The United States in multiple expressions of God-Complex-Justified outright anarchy.

Witnesses of the voyeurism cameras, their removal and retaliation against me are available, beginning with Safety Officer Mr. Hill Jnr at McRae, and as many inmates as you like.

"Section 10(b) of the Securities Exchange Act and Rule 10b-5 promulgated thereunder prohibit 'fraudulent, material misstatements or omissions in connection with the sale or purchase of a security'" (Exhibit A Exhibit 6 p.24). This affidavit provides evidence of the wholesale fraud executed by Core Civic in order to mislead the SEC/BOP/OIG/ICE/IRS and defraud its own shareholders.

And lastly, also consider that this is a workplace matter because all Immigrant inmates are required to work for wages at Core Civic, and Core Civic staff themselves were required to work in an environment where sexual harassment of the Immigrants and subsequent cover-up was part of their work assignment.

Affidavit Certified this day, November 15th, 2019.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Corey Donaldson